

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X
KELLY ANDRADE, :
: :
Plaintiff, :
: :
v. : : **COURT EXHIBIT 3A**
: : **VERDICT SHEET**
: : 21-CV-5237 (WFK) (SJB)
MICHAEL ESPOSITO and :
DANIELLE ESPOSITO, :
: :
Defendants. :
----- X

Nothing in the Verdict Sheet is meant to suggest what your verdict should be. You alone have the responsibility to decide the verdict. Please answer each question in the order given.

I. Compensatory Damages

Did Plaintiff prove, by a preponderance of the evidence, that she is entitled to compensatory damages from Defendants Michael and Danielle Esposito?

1. Circle: YES NO)
2. If you answered NO, move on to Section II.
3. If you answered YES, do you find that liability for damages should be jointly assigned to Defendants Michael and Danielle Esposito?

Circle: YES NO)

- a. If you answered YES to question 3, in what amount do you find the Defendants liable? \$ 780,000.00
- b. If you answered NO to question 3, in what amount do you find Defendant Michael Esposito liable?

\$ _____

- c. If you answered NO to question 3, in what amount do you find Defendant Danielle Esposito liable?

\$ _____

II. Punitive Damages

1. New York Tort Law: Intentional Infliction of Emotional Distress

i. Pursuant to New York Tort Law, do you award punitive damages against Defendant Michael Esposito?

1. Circle: (YES / NO)

2. If you answered NO, do not answer the following question.

3. If you answered YES, in what amount do you assign punitive damages against Defendant Michael Esposito:

\$ 500,000.00

2. New York State Human Rights Law

i. Pursuant to the New York State Human Rights Law, do you award punitive damages against Defendant Michael Esposito?

1. Circle: (YES / NO)

2. If you answered NO, do not answer the following question.

3. If you answered YES, in what amount do you assign punitive damages against Defendant Michael Esposito:

\$ 750,000.00

ii. Pursuant to the New York State Human Rights Law, do you award punitive damages against Defendant Danielle Esposito?

1. Circle: (YES / NO)

2. If you answered NO, do not answer the following question.

3. If you answered YES, in what amount do you assign punitive damages against Defendant Danielle Esposito:

\$ _____

3. New York City Human Rights Law

i. Pursuant to the New York City Human Rights Law, do you award punitive damages against Defendant Michael Esposito?

1. Circle: YES / NO)

2. If you answered NO, do not answer the following question.

3. If you answered YES, in what amount do you assign punitive damages against Defendant Michael Esposito:

\$ 750,000.00

ii. Pursuant to the New York City Human Rights Law, do you award punitive damages against Defendant Danielle Esposito?

1. Circle: (YES / NO)

2. If you answered NO, do not answer the following question.

3. If you answered YES, in what amount do you assign punitive damages against Defendant Danielle Esposito:

\$ _____

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The Jury Foreperson should date and sign this Special Verdict Sheet

Dated: September 12, 2024

Signed: Evan Claude
Jury Foreperson